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11 Attorneys for Plaintiff
12 United States of America

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15 IN THE UNITED STATES DISTRICT COURT
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17 EASTERN DISTRICT OF CALIFORNIA

18
19 UNITED STATES OF AMERICA,

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21 Plaintiff,

22 v.

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24 VICTOR ZERMENO,
25 MATTHEW MENDEZ,
26 MIGUEL BARRAGAN,
27 JONATHAN MALDONADO,
28 EZEQUIEL GUZMAN,
VICTOR DIAZ,
FRANCISCO DIAZ,
EDUARDO AMEZCUA,
MICHAEL NERI,
ALEJANDRO HAWKINS,
FRANCISCO FERMAN,
IVAN HERNANDEZ,
JORGE DELORES CRUZ

29
30 Defendants.

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32 CASE NO. 1:23-CR-00115-ADA-BAM

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34 STIPULATION REGARDING DISCOVERY;
35 FINDINGS AND PROTECTIVE ORDER

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38 STIPULATION

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40 1. The discovery in the above-mentioned case includes thousands of pages of police reports,
41 photographs, records, and search warrant affidavits that contain Personal Identifying Information of the

1 defendants, other targets of the investigation, and non-targets of the investigation.

2 2. The government will make best efforts to redact from the discovery personal identifying
3 information of parties, such as social security numbers, driver's license numbers, etc.

4 3. The parties and defense counsel, including but not limited to defense counsel's staff,
5 investigators, and outside assistants, shall not disclose the contents of the documents released by the
6 government through discovery in this case, except as necessary for investigative work for the
7 prosecution or presentation of defenses in this case. Although defense counsel may review discovery
8 items with their clients, to protect the personal identifying information that may be contained in the
9 discovery, no copies of documents, tape-recordings, or other items released by the government in
10 discovery in this case may be given to the defendant or any third party who is not a member of defense
11 counsel's staff or hired as defense investigators or outside assistants, including relatives or friends of the
12 defendant, unless such items have been redacted to protect the personal identifying information.

13 4. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the "court may,
14 for good cause, deny, restrict, or defer discovery, or inspection, or grant other appropriate relief."

15 IT IS SO STIPULATED.

16 Dated: October 25, 2023

PHILLIP A. TALBERT
United States Attorney

17 _____
18 /s/ ANTONIO J. PATACA
19 ANTONIO J. PATACA
20 Assistant United States Attorney

21 Dated: October 25, 2023

22 _____
23 /s/ ERNEST S. KINNEY
24 ERNEST S. KINNEY
25 Counsel for Defendant
26 Victor Diaz

1 **ORDER**
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IT IS SO ORDERED.

4 Dated: October 26, 2023

/s/ *Barbara A. McAuliffe*

5 UNITED STATES MAGISTRATE JUDGE

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